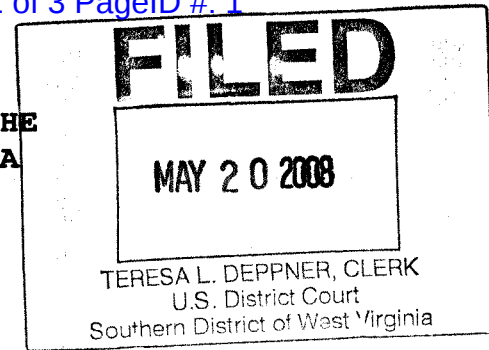


UNITED STATES DISTRICT COURT FOR THE  
SOUTHERN DISTRICT OF WEST VIRGINIA  
CHARLESTON GRAND JURY 2007-02  
MAY 20, 2008 SESSION



UNITED STATES OF AMERICA

v.

CRIMINAL NO.

2:08-cr-00115

29 U.S.C. § 501(c)

29 U.S.C. § 439(c)

DONNA ROLES

I N D I C T M E N T

The Grand Jury Charges:

**COUNT ONE**

1. At all relevant times, United Steelworkers Local 14310 (the "Union") was a labor organization within the meaning of 29 U.S.C. § 402(i) and (j).

2. At all relevant times, defendant DONNA ROLES was an elected officer of the Union holding the position of financial secretary.

3. It was part of defendant DONNA ROLES' duties to withdraw funds using checks from the Union General Fund checking account with United Bank, Beckley, West Virginia and disburse funds on behalf of the Union. It was part of defendant DONNA ROLES duties to transfer funds to one savings account also with United Bank in Beckley, West Virginia.

4. From on or about January 1, 2002, through on or about September 5, 2005, at or near Beckley, Raleigh County, West Virginia, and within the Southern District of West Virginia,

defendant DONNA ROLES did embezzle, steal, and unlawfully and willfully abstract and convert to her own use approximately \$76,420.37 of the moneys and assets of a labor organization of which she was an officer and without the labor organization's authorization.

In violation of Title 29, United States Code, Section 501(c).

**COUNT TWO**

1. The Grand Jury realleges paragraphs 1 through 3 of Count One as if they were fully set forth herein.

2. At all relevant times, the Union was required to file Labor Organization Annual Financial Report Form LM-3 ("Annual Financial Report") with the Secretary of Labor.

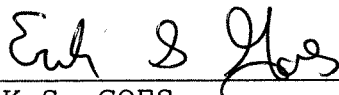
3. As part of her duties as financial secretary, defendant DONNA ROLES was responsible for giving the Union membership verbal monthly financial reports as well as maintaining documents in support of the Annual Financial Report, including canceled checks, check stubs, computerized receipts/disbursements journal, and bank statements.

4. From on or about January 1, 2002, through on or about September 5, 2005, at or near Beckley, Raleigh County, West Virginia, and within the Southern District of West Virginia, defendant DONNA ROLES willfully made false entries in books, records, reports and statements required to be maintained by 29 U.S.C. § 431(b), that is, defendant DONNA ROLES falsified computerized disbursements journal and financial reports belonging to and required to be kept by the Union.

In violation of Title 29, United States Code Section 439(c).

CHARLES T. MILLER  
United States Attorney

By: \_\_\_\_\_

  
ERIK S. GOES  
Assistant United States Attorney